

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
BRUNSWICK DIVISION

TREMAR HARRIS,

Plaintiff,

v.

OFFICER WILLIAM RENTZ,

Defendant.

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CASE NO.: 2:24-CV-9

PLAINTIFF’S RESPONSE TO DEFENDANT’S WILLIAM RENTZ
STATEMENT OF UNDISPUTED FACTS

COMES NOW, Plaintiff, Tremar Harris, by and through undersigned counsel, and files Plaintiff’s Response to Defendant’s William Rentz Statement of Undisputed Facts as follows:

29. Officer Rentz then walked behind Plaintiff, who was slouched over, and used the leg restraints to pull Plaintiff into an upright position.

Disputed: Defendant Rentz did not use the leg restraints to pull Plaintiff into an upright position. Officer Rentz put the leg restraints around Plaintiff’s neck and choked Plaintiff until he could not breathe; and, told him he was going to put Plaintiff back in the cotton field. *See* (Doc. 26-2 - Deposition of Tremar Harris taken June

28, 2024 at pg. 78:5-21; see also Doc. 20 – Surveillance Video, 3:30 – 3:35.)¹

30. Officer Rentz did not pull the leg restraints tight so as to choke or strangle Plaintiff.

Disputed: Defendant Rentz put the leg restraints around Plaintiff's neck and choked Plaintiff until he could not breathe; and, told him he was going to put Plaintiff back in the cotton field. Doc. 26-2 at pg. 78:5-21; also see Doc. 20 at 3:30 – 3:35 Plaintiff could not breathe and had soreness of his neck for a few days. Doc. 26-2 at pgs. 55:25- 56:15; also see Doc. 20 at 3:30 – 3:35.

31. Officer Rentz did not intend to hurt Plaintiff and later told him that he was “just playing.”

Disputed: Defendant Rentz intentionally placed the leg restraints around Plaintiff's neck and choked Plaintiff until he could not breathe; and, told him he was going to put Plaintiff back in the cotton field. Doc. 26-2 at pg. 78:5-21; also see Doc. 20 at 3:30 – 3:35. Plaintiff told Defendant Rentz he was going to tell Sheriff Adam Bell about the incident and Defendant Rentz stated he did not care because this was his jail. Doc. 26-2 at pgs. 78:22 – 79:4; 53:8-12.

32. The restraint lasted for three seconds or less.

Disputed: Defendant Rentz use of the leg restraints lasted over three (3) seconds. Doc. 20 at 3:30 -3:35.

¹ Surveillance Video manually filled with the Court.

33. During this time, a conversation transpired between Officer Rentz and Plaintiff where Officer Rentz asked Plaintiff, “why are you acting the way that you are?” to which Plaintiff replied that he “wanted to go home.”

Disputed: Defendant Rentz intentionally placed the leg restraints around Plaintiff’s neck and choked Plaintiff until he could not breathe; and, told him he was going to put Plaintiff back in the cotton field. Doc. 26-2 at pg. 78:5-21; also see Doc. 20 at 3:30 – 3:35. Plaintiff told Defendant Rentz he was going to tell Sheriff Adam Bell about the incident and Defendant Rentz stated he did not care because this was his jail. Doc. 26-2 at pgs. 78:22 – 79:4; 53:8-12.

34. Plaintiff suffered no physical injuries and sought no medical treatment.

Disputed: Plaintiff had soreness of the neck for several days after the incident. Doc. 26-2 at pg. 56:9-11. The jail did not provide him with treatment after the incident. Doc. 26-2 at pg. 56:5-6. Plaintiff did seek treatment after his release at Georgia Regional. Doc. 26-2 at pg. 56:16-22; 62:5-7.

Respectfully submitted this 19th day of September 2024.

/s/ Harry M. Daniels
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CERTIFICATE OF SERVICE

This hereby certifies that on this day, I electronically filed the Plaintiff's Amended Complaint with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

/s/ Harry M. Daniels
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